
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 07 December 2021 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP Working Group Call taking place on Tuesday the 7th of December 2021 at 16:00 UTC.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. For today's call, we have apologies from Steinar Grøtterød (At-Large). They have formerly assigned Lutz Donnerhacke (At-Large) as their alternate for this call and for the remaining days of absence.

As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite e-mails. All members and alternates will be

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promoted to panelists. Observers will remain as an attendee and have access to view chat only.

As a reminder, when using the chat feature, please select Everyone in order for all participants to see your chat and so it's captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom room functionalities.

Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. Seeing no hands. If you need assistance updating your statements of interest, please e-mail the GNSO secretariat.

Please remember to state your name before speaking for the transcription. Recordings will be posted on the public Wiki space shortly after the end of the call. And as a reminder, those who take part in the ICANN multistakeholder process or to comply with the Expected Standards of Behavior.

Thank you, and over to our chair, Roger Carney. Please begin.

ROGER CARNEY:

Thanks, Julie. Welcome, everyone. Before we get started on our agenda, just probably a couple updates here. Just a reminder, we have two more meetings after this one for the rest of the year, and then we'll take a short break and get started back up in January. The other thing I didn't know, Owen had sent a reply to the list with some more details that some people asked for.

And I don't know if Owen wanting to jump on and talk about anything related to that. Or now that he's had a little more time to look at the numbers, maybe he even knows or spots something different. Owen, do you have anything you want to bring up?

OWEN SMIGELSKI:

Sure. Thanks, Roger. Yeah, during the call a couple people had asked about some breakdown. More about the registrar type. As some may know, not all registrars are created equal. Some sell directly to customers, called retail. Some are wholesale. Those function through a reseller model and don't necessarily directly sell to a customer.

Then there's a brand protection registrar which primarily works with corporate customers who have trademarks and other IP interests to protect. And then also we did have one respondent who was primarily a hosting provider and had registrar services as kind of an ancillary service there just to kind of give some color to that.

And then also there's obviously different sizes of registrars. Those with under 5,000 domain names all the way up to 5 million plus. And when I looked back the numbers, I really couldn't find anything to correlate between any of those categories—the registrar type for the registrar size. The answers appeared to be all over the place. Some small ones wanted no lock. Some small ones wanted a 60-day lock. The same applied to various brands [inaudible] there.

I see Sarah's comment in chat. "Did seem to be more support for having locks than not." I think that's reflective of the overall results of the poll, and I don't think any conclusion can be drawn that says, "Oh, a retail registrar wants locks versus not wanting locks." I don't think there's anything to show that there [inaudible]. It's sporadic and all over the place for that.

So unfortunately, we can't draw anymore. I mean, I think if we have more questions and get some more detail from the Registrar Stakeholder Group, I'm certain that they'd be enthusiastic to provide and answer questions that we might have. So let's keep that in mind moving forward, and we can always revise this or ask further questions down the road. Thanks.

ROGER CARNEY:

Great. Thanks, Owen. And as we kind of talked about last time as we got a little more detail and a little refinement on our own thoughts, possibly looking at a future and [reincantation] of this whole thing of, "Yeah, okay. But here [inaudible] about these things." If we get to that spot, we can look at that,

Anyone having questions for Owen? Okay, great. Thanks again, Owen, for doing that. I'll open the floor up to any of the other stakeholder groups that maybe had some discussions over the last week or so that they want to bring forward. Anyone have anything? Okay, I guess we will go ahead and jump into our agenda and get started.

For our first item here, the Gaining FOA working document, this really was just the rationale justification for how the group thought

that basically getting rid of the Gaining FOA or supplementing it through other notifications and things like that. Staff put together a good write up of justification on our discussions where we thought this was going. I haven't seen any comments into this section here, but I did want at least to reread this so that we have it out there and make sure everybody's okay with it.

Again, obviously we're not done-done with it, but we will move on from this and then do a couple more reviews late as we're writing the report. But with no comments, I'll just turn this back over to Emily or Caitlin maybe, and maybe they can just take us through this real quick.

EMILY BARABAS:

Hi, Roger. Sure. This is Emily Barabas from staff. So I think where we left off—and this was actually quite a little while ago, I guess it was in October—the working group had agreed that we would first try to draft up a summary of the points that the group seemed to be raising in terms of supporting elimination of the Gaining FOA.

And absent any concerns about using this as the response to the charter question, we could then just draft a very short and simple recommendation essentially saying that these requirements should be eliminated from the policy.

So Roger, did you want me to read through the entire thing or just sort of summarize—it's about two pages—or just sort of summarize what we have in these paragraphs? What do you prefer?

ROGER CARNEY: I don't think we have to do word for word. Like you said, it's been out here for a while. But if we just go ahead and summarize it, that would be great.

EMILY BARABAS: Yep. So what we have here ... Just because this is a pretty big and important issue and not everyone who's going to be reading this has the context, we thought it probably doesn't hurt to provide some of the background as well in this text, which is why it's so long.

So the first paragraph sort of summarizes that the IRTP Part D Working Group had looked at the question about whether the FOA is still needed and notes that this group is revisiting this question, essentially.

And in summary, that the working group believes the requirements for Gaining FOA or a similar replacement are unjustified under data protection law and no longer necessary from a practical perspective to facilitate the transfer, recognizing that this is a big departure. It goes into greater detail.

So the second paragraph just sort of provides a summary of the issue space and why the working group is considering this issue.

The next paragraph notes that while it may be possible from a technical perspective to facilitate the transfer using a method of sharing contact information, the working group didn't pursue your specific methods for doing this because it does not believe the transfer is feasible from a legal perspective.

The next paragraph, which is at the bottom of page 16, focuses on the data protection issues and notes that the working group looked at the principles of data minimization and privacy by design and doesn't see evidence that the Gaining FOA is needed from the perspective of either facilitating the transfer or protecting the registrant from unauthorized transfers. So, looking at the principle of necessity.

The first sentence on the next page is just sort of a transition, noting the importance of sort of making sure that any value that the Gaining FOA had is transferred elsewhere. The next paragraph just sort of looks at the specific function that when the Gaining FOA requirements were in place, the transfer could only proceed once the RNH had responded to the Gaining FOA. So there's an affirmative or active confirmation element. So it's saying that it served as a notification function and also sort of this confirmation function.

And then the paragraphs following that talk about where this value is now provided in other functionality as the working group is proposing in its recommendations.

So I'm now on the third paragraph on the second page. So, the working group believes that the notifications that have been recommended under the Losing FOA document provide the necessary notifications. And the working group believes that the confirmation function is duplicative and therefore unnecessary, and that the TAC provides sufficient confirmation that the RNH intends to transfer the domain. So therefore the Gaining Registrar does not need to request this confirmation via other means.

Okay, homestretch. Second-to-last paragraph also notes the points that the Gaining FOA predated the TAC and that the Gaining FOA, before the TAC was there, the Gaining FOA was essential for facilitating the transfer and providing a function that was important to preventing unauthorized transfers. But with the introduction of the TAC, the Gaining FOA became less essential. So, providing that sort of historical context and also noting that these new security measures recommended for the TAC will make the TAC more secure and therefore more important for this function.

Oh, and Kristian is saying I'm a bit scratchy. I do apologize for that. Let me just see if I can ... Tell me if that's any better. Otherwise ... Okay, Berry says I'm clear. I'm almost done, so let's wrap it up. And Kristian, I can try to pass it on for questions if you're having trouble hearing.

And then finally, the working group noted that prior to GDPR, the Gaining FOA provided an important paper trail or record function for Contractual Compliance, but that the working group is ... And we can adjust this once we've done so. The working group is likely going to provide some sort of recommendation that will result in a paper trail. So the notifications will provide that paper trail, and we may also say something about any requirements related to retention and so forth, although that's somewhat to be determined.

So that's the summary. I see Theo's hand is up. I'll pass it back to Roger to manage the queue. Thanks.

ROGER CARNEY: Thanks, Emily. Theo, please go ahead.

THEO GEURTS: Yeah. Thanks, Roger. So I guess the third time is a charm here, but why do I still see language about key changes about the account of a registrant? I mean, I thought we settled this last week, so I'm a little bit surprised to see it back in.

ROGER CARNEY: I'm sorry, Theo. Anything specific there that I can ...

THEO GEURTS: Yeah. "The Working Group believes that the notifications detailed in recommendations XXX ensure that the Registered Domain Name Holder receives the necessary information when a key change has been made to their account."

And again, like last week, as a wholesale registrar I can't see those changes because we don't manage the account of the registrant. They are with our resellers. There is no API connection there that sends information if key changes are being made. So again, there is only a certain amount of registrars who can comply with this recommendation. And also, registers cannot.

ROGER CARNEY: Great. Thanks, Theo. I'll let Emily jump in, but in her chat she mentioned it, too. Emily, please go ahead.

EMILY BARABAS: Thanks, Theo, for raising this. Indeed, we've updated the text in the losing FOA document following that discussion and feedback that this needed more clarity and that when we say "key change" we're really just saying that notifications are being provided specifically in relation to the transfer. So this is the notification of the TAC provision and the notification of transfer completion.

So we'll update this language to match that, but it's just an oversight that it hasn't been updated yet. Thanks.

THEO GEURTS: Thank you for clearing that up. Thank you.

ROGER CARNEY: Great. Thanks, Theo, for catching that. Any other comments/questions on this? [And in the end], Emily mentioned that this is the rationale and basically our discussion behind all this, but we will probably end up with a recommendation just stating that we're dropping the Gaining FOA requirements, [however] that language comes up. And we'll come up with that. This was just the background rationale for that.

Any other comments or questions? Or else we'll jump ahead to our TAC review. Okay, great. Well, thanks everybody. We'll move on from that. We'll update that and move on. Yes. And as Julie reminded us in chat, when you're chatting please make sure to change your chat to Everyone. Okay. Thanks, Emily, for reposting.

Alright, so let's jump over to the TAC. One of the things you'll notice that we did here. We updated this to be no longer

“candidate recommendations” as we’ve reviewed this and edited it a couple of times now so that the TAC recommendations are kind of our draft recommendations now. Not that there’s a big difference there, but just so everybody notes that. And that’s why we did it is because we’ve gone through a review.

Throughout our charter questions on the TAC, we’ve created quite a few different recommendations. Not every charter question ended up with a recommendation. Some of it is just explaining. But we didn’t end up with, I think, 11 or 12—something like that—recommendations for the TAC here.

And again, we’ll jump through these. There are a few additional questions since the last reading, so we’ll jump into those. I’ll go ahead and read through each of the recommendations and see if there are any questions. But I’ll definitely stop on the ones where we’ve got comments in the document itself already.

Okay, so for Charter Question b1, we have five recommendations. We can go ahead and jump down to the recommendations themselves beyond the discussion. Yep, thank you.

Again, I’ll just read through them and see if there are any questions or comments. And we’ll get through them fairly quickly, I think.

Recommendation 1. “The Working Group recommends that the Transfer Policy and all related policies use the term ‘Transfer Authorization Code (TAC)’ in place of the currently-used term ‘Auth-Info Code.’ This recommendation is for an update to

terminology only and does not imply any other changes to the substance of the policies.”

Yeah, the big change here was just to eliminate the confusion or the multi-termed Auth-Info or Auth-Code or password or whatever else other people called this. And the transfer policy being very specific to the transfer use of this code. Any comments/questions on that?

Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. Jim Galvin, Registries Stakeholder Group, for the record. I'm almost afraid to suggest anything, but it just suddenly occurred to me that, as an editorial comment only, “in place of the currently-used term...” And do we want to say “related terms” or something like that?

And that occurs to me only just now, really, because when reading all of the prior text, we have all of these alternatives for Auth-Codes, you know—Auth-Code, Authorization Code, Auth-Info-Code, Transfer Code. I don't want to lose the opportunity to make it general enough to cover everything appropriate. Or if that's a little too much editorial editing and people think this covers it, then we're good there, too. Thanks.

ROGER CARNEY:

Thanks, Jim. Actually, I think that's a good editorial thing to bring up as the purpose here was to kind of eliminate that confusion. So the Auth-Info was the EPP idea, but all those other terms that you

mentioned obviously are in some documents and at least people refer to it as those things. So, yeah, I think we can add some verbiage to that.

Okay, yeah. It looks like you're getting support for that in chat as well.

JIM GALVIN:

Yeah, and staff [is awesome]. They're on it in real time. Can't beat that.

ROGER CARNEY:

Okay, any other comments? Let's go ahead and jump to Recommendation 2. And again, we're just going to kind of walk away from these after a while. But obviously as we write the initial report up and everything, we'll be reviewing these anyway and we'll get to review them as a whole at that time as well, along with all the other recommendations, all the other sections. So it's not like this is the last time we're going to look at it, but we are going to try to move on and consider these our base so that we can work forward from them.

Recommendation 2. "The Working Group recommends that the Transfer Authorization Code be defined as follows: 'A Transfer Authorization Code (TAC) is a token created by the Registrar of Record and provided upon request to the registrant or designated representative. The TAC is required for a domain name to be transferred from one registrar to another registrar and when presented, authorizes the transfer.'"

So, any comments questions on that? Sarah, please go ahead.

SARAH WYLD:

Thank you. This is just a wording question, not substantive. But here we're talking about registrant, and then there are other places in the document, although maybe not in a recommendations, where we talked about Registered Name Holder. So I'm just wondering how we chose one over the other. And I don't really care which one we use. I think they're interchangeable. I want to make sure that we are consistent throughout. Which maybe we are, but if we haven't just done a quick check for that, maybe that would be good. Thank you, bye.

ROGER CARNEY:

Thanks, Sarah. Yeah, I kind of agree with you. I've always used them interchangeably and maybe there is a difference that people want to bring forward, but consistency would be good.

Lütz.

LUTZ DONNERHACKE:

Lütz Donnerhacke, At-Large, for the record. I wonder if this formulation is a little bit too strict. The code, if it's presented, does not authorize the transfer. It authorizes the start of the transfer process. If we say it authorizes the transfer at all, we do not need any additional security mechanisms like FOA from the Registrar of Record.

ROGER CARNEY: Okay, thank you. Barbara.

BARBARA KNIGHT: Thank you. I guess my question would be also, really, kind of that “designated representative” piece. I believe, in the current policy, the registrant or the admin contact are the two individuals that are authorized to, I guess, request a transfer on behalf of themselves. And so I’m wondering if we should be consistent with that, or do we just opt to change that.

ROGER CARNEY: Thanks, Barbara.

BARBARA KNIGHT: Yeah, just one second. And when it comes down to a dispute, I believe that if there ever is a dispute between whether or not—or internal dispute, I should say—into who authorized the transfer, I believe the registrant would trump the admin contact. So I’m wondering if we should try to be consistent or if there’s just a plan to change that overall. Thank you.

ROGER CARNEY: Yeah, great. Thanks, Barbara. I was just going to add. I think the designated representative kind of came in to show the reality of how the systems really work and that the registrant is not necessarily the account holder. It may be two separate people, and there’s the difference that pops up. But to your point, I think

it's good to show—I guess I'm not sure of the term there—but the ultimate decision maker there being the registrant

Sarah, please go ahead.

SARAH WYLD:

Thank you. A couple of things. Okay, so going back to what Lütz mentioned about if the Transfer Authorization Code is that authorizes the transfer, then we don't need the Gaining FOA. I think that is the case. I think we have agreed that we don't need a Gaining FOA, and so I think the Recommendation 2 text is sufficient here.

And then thank you, Barbara, for bringing up the designated representative, which I did a quick search, control F, and it exists a few different places throughout this document. I don't think that it is defined. I'm not sure that it needs to be defined, but I do wonder if we should put the words "their"—"with their designated representative"—just so that it's clear that it is the representative of the registrant and not of the registrar. Thank you.

ROGER CARNEY:

Okay. Interesting solution there. Thanks, Sarah. Theo, please go ahead.

THEO GEURTS:

Yeah, I was wondering why don't we align the designated representative with the Change of Registrant Policy where we talk about designated agents, and use that language. I mean, we've

been using that one since 2016 now, and I figured sort of everyone understands what that is and what it does. To avoid any confusion. I'm not 100% sure there, and agree not to use the "admin c" anymore because that's going away anyways. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Owen, please go ahead.

OWEN SMIGELSKI: HI. As for the "designated agent" wording there, I'm going to have to disagree with Theo. I may not necessarily be speaking about my registrar, but I know some registrars use the designated agent as—and this is for those who don't know—a transfer when there's a Change of Registrant. In there, the prior registrant has to approve or "a designated agent." Quite often that's the registrar, and in some cases that's just done automatically without review. And I do not want to foresee such a scenario where registrars are automatically approving transfers on behalf of a registrar, so we need to come up with some different wording there. Thanks.

ROGER CARNEY: Great. Thank, Owen. Theo, please go ahead.

THEO GEURTS: Sorry, old hand.

ROGER CARNEY: Okay. Thanks, Theo. Sarah, please go ahead.

SARAH WYLD:

Thank you. I want to agree with Owen in this case that the “designated agent” is a very specific and defined term, and I don't think it does what we need here with perhaps incorporating the account holder as a possibility of who might receive the TAC. So I think “their designated representative” works well here.

Also, just in case we do end up no longer having a designated agent concept in the policy, then we wouldn't need to come back and change it again and define it here.

And then just going back to what Lütz was saying in the chat, I don't think we should refer to the admin contact anymore just because, as has been mentioned, we will no longer have one in the future. So we need to make sure to accommodate that. Thank you.

ROGER CARNEY:

Thanks, Sarah. Yeah, and I agree. I think that we should definitely avoid that at all costs, of bringing “admin” up, as that's something that's going to be phased out for a lot of people.

Maybe I can ask Barbara, or anyone else really, but Sarah's suggestion on changing that to “registrant or their designated representative”—does that help that concept? Do we need to be more specific? More words to that?

Barbara, please go ahead.

BARBARA KNIGHT: Thank you. I think that it does help, but I think we just need to be mindful how this policy is going to work with the Transfer Dispute Policy. And I want to make sure that we're very clear that if there is some sort of a dispute, that somewhere, if it's their designated representative, that that information is captured so that it can come into play if and when there is a dispute. Or if it's true that, in a dispute, the registrant would always be the authoritative source, then we may be okay with that. Thank you.

ROGER CARNEY: Great. Thanks, Barbara. Berry, please go ahead.

BERRY COBB: Thank you, Roger. This is really a question of curiosity to the point about the "admin contact" going away and, I guess, to Barbara's point about "designated representative" or "designated agent." So, to be precise, the "admin contact" in RDDS is going away, but I am curious and I suspect that there's probably a variety of implementations across registrars. And depending on their business model, is it conceivable that, via the account panel, that the RNH will still assign kind of a non-RDDS admin contact? Or more to the point about "designated representative" or "designated agent," how does a Registered Name Holder go about designating that person.

ROGER CARNEY: Great. Thanks, Berry. And to answer your first question, that's why I kind of hedged on my wording because I assume that there probably will be some registrars to keep maybe even a partial

“admin contact” around, similar to the TAC contact, for those reasons that you mentioned. I’m going to assume most people are going to get rid of it because having that extra data round, obviously, you want to have a reason for it. But I do agree that there will probably be some people that keep it for similar reasons.

But I’ll let Sarah speak now. Thanks, Sarah. Go ahead.

SARAH WYLD:

Okay. And Roger, you did say some of what I was thinking in terms of how might a Registered Name Holder designate a representative. It could be that their provider allows for ... You know, create a log in to your account that has access to only certain things. That's very possible. Role-based access. It could be that they just provide their main account username and password to somebody and let them login to represent them and do things.

I don't think that we need to get more specific here in the recommendations. I think we need to provide enough flexibility for different implementations while also being reasonably secure, and I think that this strikes that balance. Thank you.

ROGER CARNEY:

Great. Thanks, Sara. Theo, please go ahead.

THEO GEURTS:

Going back to Berry's question. It's very interesting one, but I think it falls outside of this group to sort of put any focus on that. I

mean, I suspect like you, Roger, that most won't go into that rabbit hole, but it might be indeed registrars with some kind of business idea or model, whatever, that they will have some sort of admin c with allowance in such a control panel of a registrant. But I think that is not up to us to make any judgment or have any opinion on that. If they want to do that, to create such accounts, go ahead. I think it's a major security risk. But, sure, go.

ROGER CARNEY:

Great. Thanks, Theo. And I would say that, obviously, something we need to keep in mind is what Barbara brought up. Making it clear when we get to the disputes area who has that that call. So again, if it's not exactly here ... I understand Barbara's concerned and that we need to make sure that we account for that later on.

Lütz, please go ahead.

LUTZ DONNERHACKE:

Do I understand correctly that the whole discussion about the formulation of "registrant or designated representative" [is about] handling how to [inaudible] registrant? If [inaudible] provided to the registrant's point. Because if there are different ways to reach him or the company or the persons involved, it's an issue within [inaudible] or anybody else [inaudible] not a part of [inaudible] is that information sent to somebody who did [represent] the registrant. That's all.

ROGER CARNEY:

You were breaking up there in between, so I'm not sure we caught everything as far as ... I think you were trying to go down the line of how that separation or where that separation and how that contact is set up ... But we kind of lost quite a bit of your speech or your talk there, so I'm not sure we can answer that really well. You were breaking up, so if maybe you can put some of that in chat and we can make sure everybody understands the concern.

Thanks, in chat. I think that's especially what we've tried to do with the notifications and make sure that the registrant—Registered Name Holder, as Sarah mentioned which everyone has preferred there—is the one that is the ultimate decider. And that's why the notifications have to get sent to them so that they know that it's happening.

Okay, so good point. I know that were trying to distinguish between the reality of today where an account holder is possibly different than the registrant, but is just leaving “registrant” here appropriate, or is “registrant or their designated representative” better?

Okay, let's go with just changing that to “registrant or their designated representative.” And again, we're not done with this, but I think that solves some of the priority or decision making here. And even if it's somewhat duplicative, I think that works out it because it takes away some of the reality confusion that we have today.

Emily, please go ahead.

EMILY BARBARAS: Thanks, Roger. This is Emily from staff. Just one additional clarification. Do we want to perhaps change “registrant” here to “RNH” and use that across the Board? Or are there objections to that or concerns with the approach? Thanks.

ROGER CARNEY: Yeah. So that’s a good question. At one time, working through different groups, it seemed like everyone was going to ... Moving from domain owner down to registrant, I thought it was heading toward “Registered Name Holder,” but I guess the working group can make that decision.

Berry, please go ahead.

BERRY COBB: Just to provide a hint of more color here, the way I’m viewing it now, especially with the proposed recommendations especially as it relates to the Transfer Policy, we’re moving away from any interaction with the RDDS maybe in the PDPR or some of those things. So it kind of seems like “Registered Name Holder” is the more applicable term to use globally. And if anywhere that it is required to use “registrant,” then we call it out and why that is being used versus “Registered Name Holder.”

ROGER CARNEY: Okay, great. Thanks, Berry. And again, I agree with others in chat. To me they’re interchangeable, but the consistency, I think, is important. So I think if we go ahead and use “Registered Name Holder” through our process and then, obviously, if we break that

somewhere, we can review it. But let's try to stick to "Registered Name Holder" in our recommendations.

Yeah, Kristian, I agree. I think they're the same, but keeping one term is great. Okay. Any other comments? Questions? All right.

Let's go ahead and jump into Recommendation 3. "The Working Group recommends that ICANN Org establish minimum requirements for the composition of the TAC (for example, minimum length, syntax, or entropy value) based on current applicable technical security standards. ICANN Org may change these requirements from time to time in response to new or updated standards, but any changes to the requirements must go in effect with sufficient time for registrars to implement the necessary updates."

Yeah, and I wonder if that should be "registries" as well. Sarah, please go ahead.

SARAH WYLD:

Thank you. I have a question which I want to ask. I don't have a prefer answer here. This is a genuine question. Is it normal for ICANN Org to be the one establishing this type of requirement? Has ICANN Org established similar syntactical length, etc., requirements in other contexts? Or is that something that perhaps we or the eventual IRT should be doing? Or is there some other ... But who normally does that kind of standard setting? Thank you.

ROGER CARNEY: That's a great question, Sarah. It can't be an IRT because there's a start and end period to the IRT, I think. And this trying to bridge that work from the IRT to the next policy setting, basically, which we know is, what, 10 years. Around that time or more.

So it's a good question on if this is typical. I just don't know who else would facilitate watching of the new standards in providing an update. But great question. Thoughts from others?

Theo, please go ahead.

THEO GEURTS: Yeah, I think Sarah has a good point there. It looks very single sided at the moment. At least there should be some consultation with registrars. You don't want to go come up with a standard and then just introduce it in a top-down style, so to speak, and then come to the realization that we have to go back to the Board to stop the new standard because it's operationally not feasible by any means.

So, yeah, like I said it's a little bit one sided. So come consultation with the Registrar Stakeholder Group would be a very good thing.

ROGER CARNEY: Great. Thanks, Theo. Jim, please go ahead.

JIM GALVIN: Yeah, thanks. Sarah, I think, asks an excellent question. And that question had occurred to me, too, as I looked at this. And so maybe just a little bit of a suggestion. If this were a protocol issue,

ICANN normally depends on those kinds of technical statements being done in the IETF. That's where we draw most of our technical requirements. This is a security requirement. It's odd in the sense that there is an Auth-Info-Code, but the Auth-Info Code ...

We could look for a document which speaks about security requirements of such a code and have a dependency on that if we prefer. This does say "applicable technical security standards." I will note that there is a new document that's just been published in the IETF that has a new extension for secure Auth-Code transfer—transitioning and moving it around. Which, as a result of that, did security considerations which passed review by the security area in the IETF. And so it has some notations about proper syntax and specifications for TAC, for example. So I think that there is a source that we could go to for this, and we could depend on that.

And I'm resisting the opportunity to suggest that we should ask SSAC because I don't think that's the right answer either. They're not that kind of body in this context. I'll just go on record putting that right out there, too. So I don't think that it's that ICANN Org should do it. I think that just a statement that it has to be based on applicable technical security standards. And we should find the reference for this one document. I can go find it here in a few minutes here.

But we need to find a way to tie ourselves to that particular technical specification which, in the ordinary sense of things in the IETF, will get updated when it needs to when those kinds of security requirements change. And the IETF is pretty good about

managing that kind of stuff. And I think that's the right place to put it.

And we already have ... Well, I know the registries do. I'll be honest. I don't know what registrars have in their contracts, but registries already have in place phrases like ... When you depend on a particular RFC, there are always phrases about "and all applicable updates, etc." There's kind of a standard phrase that goes with those kinds of things. And I'm sure that staff could go find those. And if registrars have that kind of phrase in inappropriate places, you could pull that in and use it here, too.

So I'm sorry. I just kind of dumped an awful lot there. I hope the key point I was trying to make that out, rather than repeating it. Thanks.

ROGER CARNEY:

Great . Thanks, Jim. And thanks for mentioning the SSAC because I was going to suggest your thoughts on that as well. So, good.

I guess my concern mostly on this is not that ... I understand what everybody's saying about controlling where that standard and how that gets implemented but it one of the keys here to me was that ICANN would be the one initiating that. I don't know if others think, Well, should other parties be able to initiate an update to this?

And again, four or five years from now when something comes up that everybody thinks, "Oh, wow. Why didn't we do that?" or "they're brand now. We should use that," we want to be able to have that in place so that we could use it. So I think, who can

initiate it and how it should be processed are the two important parts, and maybe we need to get that worrying down.

Jim, your hand is still up. Is that an old hand? Thank you. Keiron, please go ahead.

KEIRON TOBIN:

Thank you. Just in regard to that, I think I agree with Sarah. Between registrars as well, sometimes turfs are brought into it and stuff like that. And I don't want any further kind of restrictions just in regard to how we've dealt with it and stuff like that. Obviously, we do our own internal reviews, and I think just bringing ICANN into it may kind of just complicate things.

I understand both sides of the argument and, but I think I'm more leaning towards the side of maybe ICANN isn't the right group. Thank you.

ROGER CARNEY:

Thanks Keiron. Daniel, please go ahead.

DANIEL NANGHAKA:

[inaudible] the issue of standardization. I believe we should be so flexible to be able to refer to other standards that have been created. For instance, the IETF standards. Especially if this can act as a benchmark, it could be a very important guide in addressing the security concerns that we face, especially in how the TAC is communicated or delivered to the RNH.

And also furthermore, the moment we happen to think about loosening the security in the TPR, in the Transfer Policy. I see our discussions have been grounded so much on the issue of security right from the start of the of the working group. Security is a very big concept which is very undisputed, but let's look at what security measures are in place, and can they act as a benchmark. And can we rely on them to enable the TAC to be transferred successfully. Thank you.

ROGER CARNEY:

Great. Thanks, Daniel. Okay, I think that, obviously, there are some concerns on how this is written. Maybe we can ask the group to look at this this week and provide some alternate language here. I know we've heard a couple ideas and obviously the IETF is a good place to go, but there's obviously some other paths that standards can come [inaudible], as Daniel mentioned.

I think that we have to think about this in the two ideas of, okay, how can this be initiated and what is the process to follow? And I think that, obviously, all the contracted parties probably need to be involved for this update to occur because it's going to affect all of them to some degree. So I think, obviously, the big thing here is let's see if people can come up with some different wording for this to hit the points that they're looking for, and we can review those.

Theo, please go ahead.

THEO GEURTS:

Yeah. I think it's important that if we discuss standards ... And there's so bloody many of them and they all have sometimes

different requirements. If you look at the current push in the EU when it comes to cybersecurity with certifications and God knows what these guys are coming up with, that is currently not happening in the rest of the world. So you have some diversions all across the place.

So I think Jim's suggestion about IETF might be a good one, provided that we know what's in there. So I think for this working group, let's have a look at it and if it makes sense and it's reasonable and it is secure enough, let's go for that one. We are talking about TAC here, and that is not such a complicated issue in my mind. So let's review the IETF recommendations on it and see if we can live with it and the process they have. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. So I think that's our steps forward. We can take a look at that. And again, I think people can take a look at this recommendation and make suggestions on wording so that that works out better. And again, I think it's the two phrases of, okay, who initiates, how is it defined, and then what's the process to make that update.

Some other PDPs did some really heavy-handed stuff to take it from policy to the next policy. And I don't want to get too complicated here, but I do want to be able to obviously afford ability to be able to update security if it makes sense later on. Okay.

Yes, Sarah. Great homework project. All right. Any other comments/questions? Or else we'll move on. And we'll do our homework on #3, for sure. Okay, let's jump into #4.

Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. This is Emily from staff. I wanted to just put a pointer to a comment from in Recommendation 3 in the final sentence. I think I had mistakenly put "registries" there and he switched it to "registrars." But now I'm looking at it and think maybe "contracted parties" is the right term to use since there may be impacts on both registries and registrars with respect to changing any standards around the TAC syntax requirements simply because registries may be, later in the recommendations, verifying that the TAC is meeting those requirements. I just wanted to verify if that's correct before making any changes. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. All right, let's go ahead and jump into Recommendation 4 then.

"The Working Group recommends that the registry verify at the time that the TAC is created in the registry system that the TAC meets the requirements specified in Recommendation 3."

Jim, please go ahead.

JIM GALVIN: Thanks, Roger. So, yes, I put it in a comment instead of changing the words. I hope this is really an editorial change, but I think it should say “stored” or “set” as opposed to “created” since it is the registrar that creates it and it's passed to the registry. Thanks.

ROGER CARNEY: Thanks, Jim. I think that makes perfect sense and I would agree that the registry responsibility here is storage and not any creation. Any other comments/questions on this? Thanks for that update, Jim.

All right, so let's jump into five. It looks like we have a few comments on this. But I'll go ahead and read it and then we'll open it up.

Recommendation 5. Theo, did you want to jump in first?

THEO GEURTS: No, just read the recommendation and then I have a question.

ROGER CARNEY: Okay. Let me go ahead and read it, and then I'll let you go. “The Working Group recommends that the registry notifies the Registrar of Record after the Gaining Registrar has made a certain number of failed attempts to enter the TAC at the registry. The Registrar of Record may subsequently also provide a notification to the registrant that these failed attempts have taken place. ICANN Org may change from time to time the number of failed attempts that trigger a notification.”

Again, there were a few comments here, but I'll let Theo jump in on this now.

THEO GEURTS:

Yeah, so maybe this is good info for some of the group who are not very familiar how also registrars work. But if you look at wholesale registrars, you will notice on their websites that they have usually something called a domain name transfer service. And basically, that allows resellers to enter or upload a CSV with like 1,000 domain names or 10,000 domain names with the Auth-Codes. And you can upload that or provide it through an API.

And sometimes the reseller is mixing up the CSVs and is entering the wrong files and Authorization Codes and the wrong domain names because they just filter it incorrectly. And then you generate a thousand errors. Maybe that is something we can tackle when we talk about bulk transfers. I am not sure, but giving the recommendation as it is now and how the situation is now, well, you could generate a ton of errors because somebody had a very bad Monday and started out with no coffee. Thanks.

ROGER CARNEY:

Yeah. Thank you, Theo. Sarah, please go ahead.

SARAH WYLD:

Thank you. So the comment that I left in the document is, are we failing to set a new TAC or is it that we're trying to transfer a domain and providing the wrong TAC? I think it's the second thing.

We're providing the wrong TAC when trying to do a transfer because it's the gaining registrar who's made the failed attempt.

But I've got to say if I got tripped up reading it, then probably the implementers will have similar questions. Right? I'm not the smartest person in the room, but I'm also not the stupidest. So maybe it needs to be more clear. Yeah, so I think we could make it more clear in that regard.

And then my second question is, if we are right now in the PDP setting the number of failed attempt that trigger this, then do we really want ICANN Org to be able to change that in the future? Or is that a policy decision? Thank you.

ROGER CARNEY:

Thanks, Sarah. Yeah, and I agree. If anybody's tripping over this now, then we definitely have to update the wording so that it makes more sense plainly. Sarah yeah and I agree if anybody's tripping over this now, then we definitely had to update the wording so it makes more sense plainly. When we agree with this today and in a couple of months when we're writing the initial report and we can't make sense out of it, then we know the wording's wrong. But, yeah.

So let's update the wording so that we can get it to make sense. And as Emily mentioned and my recollection is that, yes, we're talking about the gaining registrar somehow providing an incorrect TAC, a different TAC that what's stored at the registry, we'll say. And obviously, there are many reasons for that. After a certain

number of attempts, it seems like someone should be notified that something's happening. That's the purpose of this.

Berry, did I cover what you were saying? Did you want to say something else?

BERRY COBB: Yeah. I think where this originally came from, Jothan had mentioned maybe even back when we had our small team about brute force attempts. I'll just leave it at brute force. That's kind of how this got started in this particular context.

ROGER CARNEY: Great. Thanks, Berry. And then jumping onto Sarah's second question, if we are setting a number in policy, do we want to give ICANN Org the authority to change that when they feel that it's necessary or should that actually be looped back into—I think, as Sarah mentioned—policy process. So I think that's a second question. If we are definitely setting this number, do we what that change to be able to happen, or should that actually come back through a policy?

Theo, please go ahead.

THEO GEURTS: Yeah. And going back to Berry, that is some good information on the origins of how we came to this. But if it's a fear of brute force attempts, my suggestion would be that if you want to tackle that issue, then just name the issue and make sure that the registrar

has some kind of policy in place to detect such brute force attempts and make sure that the registrar will deal with it accordingly, whatever needs to be required.

If a reseller bumps up the registrar system with 1,000 invalid requests, that doesn't necessarily mean that's a brute force attempt. It could be pure stupidity and you might want to contact the reseller first or the registrant or whatever the person is doing. It could be a domainer making a mistake. I mean, if you want to detect brute force attempts, I think you need some other measurements in place. But just described that in short, broad wording into the policy so that everybody can comply with it and make sure there are additional requirements to detect and mitigate and solve brute force attempts. Just name it. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah, and I think that, as Berry mentioned, the brute force was one of them. But to your point, I think that was something else. And I can't remember who brought it up—it was early on—that maybe it is just an error that a system is sending the wrong thing and that it's not truly a brute force attempt. It's just a bad system function somewhere that could be causing this. And notification to the Losing Registrar hopefully can get that conversation started and found and fixed.

If there are, again X number of times that somebody has tried this one TAC and it's not working, I think that ... Again, brute force being one component, but I think someone else brought up a system issue of it's just bad code written or whatever it is. As you mentioned, Theo, maybe someone just didn't have enough coffee

or had too much coffee and they were a little jittery there. That was the purpose of this trying to get around.

And I think that that's it, also. I think we did talk about a number of failed attempts and a certain time. And I don't know that we ever came to an agreement on that. Obviously, it's an option here. Do we do a number of failed attempts?

And again, I think that what we're really trying to do is, yes, stop brute force, but really I think that's probably just one of ... To me, the systemic one is probably a bigger issue that probably would occur. But obviously, brute force is the most concerning one.

Theo, please go ahead.

THEO GEURTS:

So in my opinion, regardless of what the result is, being it bad code or being it a brute force attempt, I think ... Now I don't speak for anybody, but in general speaking, every Gaining Registrar has a very commercial interest in making sure that those domain names are coming in. So usually, registrars are very aware and make sure that those transfer are coming in because we make money out of those. It's as simple as that.

So I think that if we do enough monitoring to tackle such issues, we could reflect that in the policy because I suspect that most of us are doing some kind of monitoring anyways to tackle issues where domain names are not coming in for whatever the reason is. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Jim, please go ahead.

JIM GALVIN: Thanks, Roger. So I had a comment about this thing which is a little lower down which I'm sure is going to come up next. But let me take a step back here and, speaking from a security perspective, offer the following comment.

I think that, from the principle of wanting to provide protection to a registrant, the concern here is that we're trying to protect against is that there's some sort of malefactor involved, perhaps from the Gaining Registrar or the Gaining Registrant. Something in that relationship or process, even if they're resellers there. So we're trying to provide a little extra layer of protection to the original domain holder.

I think that one could make the case that if everything is working the way it should, then the only real potential risk here is that the new registrant with the Gaining Registrar has somehow mis-entered the value that the Gaining Registrar wants to use. And one would think that you should do something about that very , very quickly. I don't think we have to make a big deal about this number of failed attempt. We should just pick a number and decide what it is. And that can be the uniform standard for the industry. But I think there's a lot to be said about uniformity here.

I actually think the number could be pretty low. You could even make a case for it to be one. But one is probably too little because you do want to the registrant have an opportunity to change it again. I think that some small number of attempts ... It's more

than just notifying the current Registrar of Record to pass the message on to the registrant. I think that there's something to think about here, that the transfer should not be allowed if you've entered X number of failed attempts.

If you're really trying to protect the registrant, if that's the goal here, then I think the Gaining Registrar systems have to make it clear to their registrant. "If this is wrong and I'm giving the right value here, and yet what you're giving me is wrong, we need to be very careful here. Don't just keep giving me three things, the same thing over and over again. You might want to go back and check that you've got the right value or get a new value."

I think that something to think about here is not just for the registry to notify the Registrar of Record, but also maybe the registry disables the transfer and said, "Sorry, the transfer can't occur now." And you make them go get another one. Go back to the Registrar of Record, get another TAC, and bring that over after some small number of attempts. And you can just pick a number to make all of that work.

So I just dumped a lot out there. My last little bit of comment that I said before, I highlighted the word "may." One thing to keep in mind here is that in order for this system to really work, whatever we decide we want it to be, if the registry is going to tell you something, it ought to be required to pass it on. Otherwise, what's the point of passing it down? You're not achieving the security objective in anyway if it could just be ignored by the Registrar of Record.

So anyway. I hope that was clear. I kind of added some new stuff
fin there. Thanks.

And I apologize if I missed this discussion. I feel like I don't
remember having a real discussion about this. I think I might have
missed something, so maybe I added some new stuff here.
Thanks.

ROGER CARNEY:

Great. Thanks, Jim. And I agree. I think that you bring up valid
concerns. And I think we did talk about some of them. Your
number. Yeah, I think that it can't be one, but I think it can be a
low number.

Your other comment on the "may" part. I think that the concern
here is that if it's a systemic issue, that's the only time the "may",
to me, would come into effect. If the registry told the Losing
Registrar, "Hey, there are failures," and the Losing Registrar looks
and it's like, "Oh, we're not storing the code. We're passing to the
registrant. We're getting it mixed up somehow," to your point, I
think that they'll probably reissue a new one. But that
communication ...

That's the only reason I can see a "may," but to your point I
understand that when you're calling out and using it as a security
mechanism, the "must" makes sense.

Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yes, I agree with what Jim just say, to most parts. I agree that the number should definitely be low. I wouldn't guess any more than five. Actually dealing with some customers in regard to this, you'd be amazed how many people put the letter L instead of an I. Or they put a space before or after. So the number can be relatively low.

I do disagree with Jim's point just in regard to potentially suspending it or requesting a new one because, obviously, if they've failed at that point then it's clearly working. But if the individual did decide to request that, then they could. So, yeah, I think that's a good point, though. Thank you.

ROGER CARNEY: Great. Thanks, Keiron. So it sounds like maybe the number can be somewhere between three and five. And we can mess with that.

But to Jim's other point that's not in here. Okay, should the registry basically stop that chain of process when it does reach five? Should the registry basically blank the TAC qat that time so that no transfer can go through? I don't know if it means blanking it or just not allowing it after. But people think about as well. Is that something we want to do as well?

Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. This is Emily from staff. I just wanted to recall some earlier conversations that we had around this one. There

were originally two formulations of this recommendations. One being the notification, and the alternative being something along the lines that Jim was recommending where the transfer basically can't go through if there's a brute force attempt that appear to be happening.

And I think it sounded from the conversations like maybe that option was eliminated from consideration because it was raised that this could potentially be a way to game the system. That some nefarious actor could ... You don't put forward a brute force attempt, essentially, to derail a transfer by another party. So I don't know if the group wants to revisit that discussion, but I think that was the reason that was disfavored in earlier conversations. Thanks.

ROGER CARNEY: Thanks, Emily. Sarah, please go ahead.

SARAH WYLD: Thank you. So I just wanted to go back to the first sentence, now that we've really thoroughly gotten ensconced later. Going back to the earlier conversation, I did purpose a way to turn this sentence around to just make it more clear about, first, if this problem occurs, then this is what you do.

And Roger, I want to thank you for bringing up the question of, should all of these invalid TAC attempts result in something like blocking the domain or blanking the TAC, something. I do think we need to consider that, yeah. Thank you.

ROGER CARNEY: Thanks, Sarah. And I'll give that credit back to Jim since I think he was the one that mentioned that.

Lütz, please go ahead.

LUTZ DONNERHACKE: I hope you can hear me better now.

ROGER CARNEY: Sounds good, Lütz.

LUTZ DONNERHACKE: I want to reiterate a point from the chat. Is the right per domain or per time frame? So if they are provided a wrong TAC for about 50 domains, does it reach the number of failed attempts or is the failed attempts per domain name? [I do not] understand this.

ROGER CARNEY: Yeah. Thanks for that. And we haven't really gotten into the bulk discussion but, yeah, that would be an issue if we did that. And that's a good point. And I'm thinking the way this conversation went was, we were thinking at the domain level. So it would be five failed attempts. And maybe the TAC isn't even the same, but five failed a attempts of a transfer request on a domain.

Jim, please go ahead.

JIM GALVIN:

Thanks, Roger. And I think that clarification about per domain is an important one. And as an additional clarification in terms of this process, I think that from a security perspective if you're not going to disable the transfer after you've had too many failed attempts, whatever that number is, then I think what you really want here is one of two things. Either the transfer should stop because you've tried too many times and you should force a reset.

And ideally, that really should never happen, so that's not really supposed to be a problem. I realize that from a usability point of view, customer service point of view, that sounds really harsh. And it is harsh in that respect, but there is actually a question of how often do we think this will really be a problem. How often is it likely to occur? That might be a little hard to predict.

But if you don't want to do that, if you don't want to think that the registry should just disable the transfer ... And the way it would do that is simply to delete the TAC that it has stored in the system because then it won't even allow for a transfer to occur. Right? That's the way we're building this overall protocol here.

The thing that I would suggest here is that you should say that what the registry should do is after X number of attempts and for each attempt after that that failed, you should send a notice to the Registrar of Record. In other words, you need to know that this is continuing to happen. You don't want to send it just because you've got five and then just keep allowing them to keep trying. If you're not going to stop it, then you have to keep feeding the Registrar of Record that something is going on here, and you have to hope that they're going to want to deal with that. And that's another reason why you want to change that "may" to a

“must.” The Registrar of Record “must” pass that notification on to the registrant.

And the means by what exactly what that is, don’t have to be specified. Right? Because passing it on could mean a phone call to say, “Hey, did you really want this to happen? And why is this nor working?” So you can begin to deal with it that way.

But, yeah, two things. You either stop the transfer or you have to make sure that you keep reporting the fact that the failures are occurring because there is something happening and you need for that message to be passed on and made visible in the right place. Thanks.

ROGER CARNEY:

So, Jim. Just a quick follow-up to that. Even if you did stop the transfer, that doesn’t stop the Gaining Registrar from annoying the registry continuously. Even though you’ve stopped it, they can still continue to request the transfer. How do you hand that?

JIM GALVIN:

Well, on the one hand, I would say that registries themselves should have mechanisms built into their systems for their own protection as an ordinary operational thing for registrars who are doing things a little out of the ordinary. So if there’s a registrar out there who keeps sending in these transfer requests, presumably the registry as a normal operational monitoring matter would notice that, “Hey, why are they requesting a transfer when there is not TAC present?” And that would surface and then the registry would deal with that.

I don't think that we need to speak to that here. I just think the registries that care will have that as an ordinary thing.

ROGER CARNEY: Thanks, Jim. Theo, please go ahead.

THEO GEURTS: Yeah. I'm still not very happy about this. Back in the day when I did tech support, you don't want to know how many times a registrant can enter an Auth-Code wrongly. I mean, it is sometimes completely nuts. And if I talked to other registrars back in the day who also did tech support, they encountered the same issue. People were typing in the TAC from an e-mail, making spelling errors. Literally, sometimes in the log you'd see 15 attempts before the registrant finally got the right one.

So if you go with a number of [—three failed] attempts, you're going to have ... The tech support desks are going to have a field say with this. Thanks.

ROGER CARNEY: Right, Theo. Good in put on that. Sarah, please go ahead.

SARAH WYLD: Thank you. Theo is giving me flashbacks. I also used to do domain services tech support. And that was, indeed, a huge problem. Is it an L or a 1, a 0 or an O? Yes.

So what if we said that registrars “must” notify the registrant and “may” take further action including resetting the TAC or relocking the domain? And that way, we make sure that the registrant is informed. But the issue that Kristian brought up in chat about blocking valid transfers of other people’s domains I think could be prevented or reduced or mitigated.

And then also, if we do say that the registrar “must” inform the Registered Name Holder, we should consider if we need to provide a template or a requirement for what goes into that notice, similar to the other notices we’ve talked about. Thank you.

ROGER CARNEY: Thanks, Sarah. Theo, please go ahead.

THEO GEURTS: Yeah. Just one question/idea. Gaining [inaudible] or notifying the registrant. I don’t see how you are going to do that as the Gaining Registrar. You have no information about the Losing Registrar information. You don’t have access to it. You only have something called “redacted for privacy” in WHOIS. You have no idea how to contact them.

ROGER CARNEY: Yeah. I think Sarah was thinking that the registry would notify the Losing Registrar, and the Losing Registrar would contact the registrant.

THEO GEURTS: Oh, yeah. That's a pretty good idea.

ROGER CARNEY: Is that what you were saying, Sarah? I think that's what you meant.

SARAH WYLD: Yeah. I always mix up Registrar of Record versus ... Yeah. Yes, yes.

ROGER CARNEY: Okay, thank you. I saw some updated wording here.

BERRY COBB: Roger, are you still there?

ROGER CARNEY: I am. Sorry, yes. I was reading. I'm sorry [inaudible]. Thanks, Berry. Yeah, I was just reading through that again. I think we're close on that. The only other question ... We've had a good conversation about that piece, and I don't remember, maybe it was Sarah that brought up the last sentence and if that should be in this recommendation or should that go through a policy process to update that. And if I remember right, someone in chat, I think, said policy. But I think Sarah's the one that brought that up.

So we should probably discuss that last sentence as well, and people's thoughts on that. Again, this first part, we have a few

updates that we need to make. And I think most of them are in there, but that last sentence was still a question. So thoughts on the last piece? If we're setting a specific number here, do we want ICANN Org to have the ability to change that number without going through policy?

Keiron, please go ahead.

KEIRON TOBIN: I just wanted to go back just a bit of a step. In terms of the registry, what does it consider a brute force if the domain is unlocked, for example ?

ROGER CARNEY: I don't know that a registry ... And again, as Jim mentioned, I'm sure registries have monitoring in place, but I don't know if they have a defined brute force number there.

KEIRON TOBIN: And then just another point as well. In term of if it was three or five or something like that, how long is that time scale? Is that something that we want to put in? Is it within 24 hours? An hour?

ROGER CARNEY: Yeah, and I think we're trying to move away from the thought of forcing the stop of this. And that if we come up with three or five, whatever it is, that it's going to be up to the registrar. They have to at least communicate it to the registrant, and then they may do

something about it besides that. I think that's what Sarah was suggesting.

KEIRON TOBIN: Okay, perfect. Thank you.

ROGER CARNEY: Theo, please go ahead.

THEO GEURTS: Yeah, on the last sentence that "ICANN Org may change from time to time the number of failed attempts." Again, like I said on the other one, it's very one sided. I think there should be some kind of process. I think we're sort of delving into somewhat, but we encountered in the EPDP also into chains of legislation regarding domain names, etc., in terms of security. Maybe we should look at that recommendation back there, though I wasn't very happy with that one also. I thought it was a little bit overkill. But some kind of process. Yeah. Not something just like, "Okay, it's Monday and it's a fully moon, and we're going to change the number of failed attempts." That's just not going to work here.

ROGER CARNEY: Thanks, Theo. Yeah, and I thought the same thing as it was brought up. I know the EPDP had some work around that on certain areas, and I know Subsequent Procedures also did some. And again, it was much bigger than I wanted to into here—some ongoing, living group that allow certain things to change through

some mechanism. I don't remember the exact thing. It was just bigger than I want to get into here.

Okay, we only have a few minutes left and we're making really good progress and, I think, really good updates here. But I think that we're going to have to come back to these recommendations next week and cover them again. Not just the ones we did, but the remaining five or six that we have.

For the homework here, let's look at numbers 3 and 5, specifically, and see if we can come up with some wording to change these so that it matches. And I think that what I've heard today is probably remove that last line for now of 5.

One question I did have before we jump off is that Sarah mentioned that if we're setting this number ... And I wonder if we should be setting this number or if we supply a suggestion to the IRT and the IRT sets that number. Or should we set the number? Something to think about. Obviously, the IRT likes as much specifics as they can get. But also, I know the IRT likes the flexibility of making sure implementations work. So just something to think about—if we're going to set that number or if we're going to provide a suggestion to the IRT that they can update as well.

Okay, we've got one minute left. So again, homework. Take a look at these. And again, 3 and 5, we made some good changes to, so I think we need to look at them and make sure the wording works for us, especially on 3. We need some more suggested working here. And again, we're going to come back to these next week, along with the other six that we haven't done and review those. So

please take a look at all of those and provide comments in the doc.

Anything else before we jump off? We've got a few seconds. Any comments? Anyone from the group? Anyone from staff? Thanks, Emily.

Okay, great. Well, thanks everybody. Great discussion today, and we will talk to you next week.

JULIE BISLAND: Thank you, Roger. Thanks, everyone. Have a good rest of your day. This meeting is adjourned.

[END OF TRANSCRIPTION]